

## **REMARKS**

Reconsideration and allowance in view of the following remarks are respectfully requested. Claims 5, 7, 20 and 24 remain pending. No claims have been amended.

### **Rejection of Claims 5, 7, 20, 28 and 29**

On pages 2 and 3 of the non-Final Office Action, the Examiner rejected claims 5, 7, 20, 28 and 29 under 35 U.S.C. 103(a) as allegedly being unpatentable over *3Com Corporation (Handbook for the Palm V Organizer*, 1999) ("3Com") in view of U.S. Patent No. 6,822,640 to Derocher and further in view of U.S. Patent Application Publication 2001/0044319 to Kobayashi. Applicants respectfully traverse the rejection.

Claim 5 is directed to a method for displaying information. The method includes, among other things, displaying computer generated information in a display screen region of a hand held device in an area identified by permanent printing, wherein the hand held device comprises a main display screen region distinct from the display screen region, the main display screen region free of any area of permanent printing, the display screen region is implemented using a first display screen unit, and the main display screen region is implemented using a second display screen unit. On page 3 of the non-Final Office Action, the Examiner alleged that 3Com, at pages 6, 7 and 15-20, discloses the above feature of claim 5. Applicants respectfully disagree.

Pages 6 and 7 of 3Com disclose components of a Palm V organizer. The components include a touch-sensitive organizer screen for displaying applications and information stored in the organizer (3Com, at page 7) and a Graffiti® writing area where one may write letters and numbers using a Graffiti® alphabet (3Com, at page 7).

Pages 15-20 of 3Com illustrate various elements of the organizer interface, such as, application icons and areas for activating an alphabetic or numeric keyboard (see 3Com, at page 15). Page 21 of 3Com discusses use of Graffiti® writing software to enter text and numbers.

3Com illustrates that letters may be written as simple strokes with a stylus in an area for writing letters and numbers may be written as simple strokes with a stylus in an area for writing numbers (see 3Com, at page 21).

Applicants submit that 3Com is completely silent with respect to disclosing or suggesting displaying computer generated information in a display screen region of a hand held device in an area identified by permanent printing. 3Com discloses that computer generated information is displayed in a display screen region of a hand held device. However, the display screen region is not an area identified by permanent printing. The Graffiti® writing area is a region of a hand held device. However, the Graffiti writing area is only an input area and is not a display area. No computer generated information or any other information is displayed within the Graffiti writing area.

Applicants submit that Derocher and Kobayashi also fail to disclose or suggest, either separately or in any combination, displaying computer generated information in a display screen region of a hand held device in an area identified by permanent printing, as required by claim 5. Therefore, Applicants respectfully request that the rejection of claim 5 and dependent claim 28 be withdrawn.

Claim 20 is similar to claim 5 and is patentable over 3Com, Derocher and Kobayashi for at least reasons similar to those discussed with respect to claim 5. Therefore, Applicants respectfully request that the rejection of claim 20 and dependent claim 29 be withdrawn.

Similar to claims 5 and 20, claim 7 recites displaying computer generated information in a display screen region of a hand held device in an area identified by permanent printing. For at least reasons similar to those discussed with respect to claim 5, above, Applicants submit that claim 7 is patentable over 3Com, Derocher and Kobayashi and respectfully requests that the rejection of claim 7 be withdrawn.

To establish a *prima facie* case of obviousness, the Examiner must meet three criteria. First, there must be some motivation or suggestion, either in the references themselves, or in the knowledge generally available to one of ordinary skill in the art, to combine the references. Second, there must be a reasonable expectation of success, and finally, the prior art references must teach or suggest all the claim limitations. The Examiner bears the initial burden of providing some suggestion of the desirability of doing what the inventor has done. "To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references." MPEP 2142.

The Examiner must apply the preponderance of the evidence standard when determining whether there is motivation to combine. The legal standard of "a preponderance of evidence" requires the evidence to be more convincing than the evidence which is offered in opposition to it. With regard to rejections under 35 U.S.C. 103, the examiner must provide evidence which as a whole shows that the legal determination sought to be proved (i.e., the reference teachings establish a *prima facie* case of obviousness) is more probable than not. MPEP 2142. Applicants submit that there is no motivation to combine the cited references as suggested by the Examiner.

Derocher discloses an illuminated touch pad. The touch pad may include a light-emitting layer and may permit a user to enter alphabetic, pictographic, or other symbolic character (see Derocher, col. 6, lines 58-67). The touch pad may also be used to perform the functions of user-definable or "soft" keys (Derocher, col. 7, lines 1-5).

On page 3 of the Office Action, the Examiner indicated that the suggestion/motivation for combining 3Com and Derocher is to provide a user with another means for entering information. Applicants wish to point out that page 20 of 3Com discloses three ways to enter data, (1) using an onscreen keyboard, in which a user may enter data by tapping an onscreen key

to enter data represented by the key, (2) using a Graffiti writing area to enter data with strokes from a stylus, and (3) synchronizing with Palm Desktop software. Wherein 3Com already teaches multiple means of entering information, Applicants respectfully submit that one of skill in the art would not be motivated to add yet another input means. Furthermore, the input means listed above regarding the onscreen keyboard and the Graffiti area already provide substantially the same functionality as that offered from Derocher. Therefore, Applicants submit that one of ordinary skill in the art would not be motivated to combine the touch screen of Derocher with 3Com, which provides an onscreen keyboard to provide the user with another means of entering information in a simple and effective manner.

For at least the reasons discussed above, Applicants respectfully request that the rejection of claims 5, 7, 20, 28 and 29 be withdrawn.

#### **Rejection of Claim 24**

On page 5 of the non-Final Office Action, the Examiner rejected claim 24 under 35 U.S.C. 103(a) as allegedly being unpatentable over 3Com, Derocher and U.S. Patent No. 6,658,272 to Lenchik et al. ("Lenchik"). Applicants respectfully traverse the rejection.

Claim 24 is directed to a method, in a hand held computer system, for displaying information. The method includes, among other things, in response to an event, displaying computer generated information on a second display screen region identified by permanent printing therein, wherein the displaying computer generated information does not interfere with displaying program information on a main display screen region.

Applicants submit that, for at least reasons similar to those discussed with respect to claim 5, 3Com and Derocher do not disclose or suggest displaying computer generated information on a second display screen region identified by permanent printing therein. Lenchik fails to satisfy the deficiencies of 3Com and Derocher. Further, for reasons similar to those

discussed above, with respect to claim 5, Applicants submit that one of ordinary skill in the art would not be motivated to combine the teachings of 3Com with those of Derocher. For at least these reasons, Applicants submit that claim 24 is patentable over 3Com, Derocher and Lenchik and respectfully request that the rejection of claim 24 be withdrawn.

### **CONCLUSION**

Having addressed all rejections, Applicants respectfully submit that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

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Correspondence Address:

**Cust. No. 49637**

Berry & Associates, P.C.

9255 Sunset Boulevard, Suite 810

Los Angeles, CA 90069

Phone: (310) 247-2860

Fax: (310) 247-2864

Respectfully submitted,

By: Richard C. Irving

Richard C. Irving

Attorney for Applicants

Reg. No. 38,499

Phone: 410-414-3056